

processing. As Bell Atlantic and others admit, call processing time may increase by up to four seconds a call, not including the delay introduced by routing each call through two operator systems.²⁰ AT&T has estimated that BPP would increase the processing time of even the simplest calls by 25%, and could increase processing time on some calls by as much as 20 seconds.²¹ Moreover, this increased call processing time will remain until SS7 has been deployed.

Furthermore, if BPP is implemented, callers will suffer with two different operator systems on each 0+ call. First, the local telephone company operator system will need to determine which OSP will handle the call, and then, because there is no automated way to pass this information on to the OSP as yet, the OSP operator will need to request billing information and, in some instances, routing information. This need to use two operators per call would significantly degrade service and unnecessarily increase call processing time, not to mention confuse and frustrate customers.

2. BPP Should Not Be Mandated Because Consumers Will Already Be Familiar With The Status Quo

The Commission proposes a plan that will make 0+ dialing confusing and inconvenient for the caller despite the fact that a simpler and more efficient access method that everyone is

²⁰ Bell Atlantic Petition for Rulemaking at 5-6.

²¹ Comments of American Telephone and Telegraph Company, filed October 2, 1987 in RM-6113 at 23.

accustomed to using is already in place. The MFJ Court and the Commission have painstakingly taken steps to ensure that end users of pay telephones presubscribed to a particular OSP have access to the OSP of choice.²² The public telephone presubscription process is well-established and consumers have been and continue to be educated about gaining access to their preferred carriers.²³ All OSPs are now required to offer methods of obtaining access to their network through the use of access codes or 800 numbers. In short, a better means of allowing customers to choose their preferred 0+ carriers is already a reality, and it is provided through a mechanism that is far less complicated, far less confusing and far less costly to the caller than BPP.

3. It Remains Unresolved Whether The BOCs Can Provide Operator Services To OSPs Under The MFJ

In August 1986, AT&T filed for a declaratory ruling from the MFJ Court to determine whether the MFJ proscribes BOCs from providing operator services to OSPs.²⁴ AT&T argued that every operator call completion and assistance function that OSPs

²² See NPRM at 3-4.

²³ The consuming public will have several years' experience with presubscription and alternative forms of access such as 10XXX dialing before BPP can be provided. Callers will thus be thoroughly familiar with the present system and will have learned how to access their carrier of choice, just at the time the Commission wants to change the entire system.

²⁴ AT&T's Motion for Declaratory Ruling on Operator Call Handling in United States v. Western Electric Co., C.A. No. 82-0192 (D.D.C.), filed August 20, 1986.

perform today is an interexchange service. As such, AT&T asserted that the BOCs are prohibited from providing these services under the MFJ.²⁵

Unfortunately, the Court has not resolved these MFJ issues. Mandatory BPP, forcing all pay telephone 0+ calls to go through LEC operators raises serious issues of decree violations that can only be resolved by the MFJ Court. Stated differently, the Commission should not proceed with this rulemaking until these important legal questions are resolved by the MFJ Court.

4. The Commission, Like The MFJ Court, Should Shelve Its Tentative Decision To Implement BPP Until It Can Be Provided Efficiently And The Costs Are Known

- a. Contrary to the claims of Bell Atlantic and others, the MFJ Court did not mandate LIDB or BPP and the BOCs already were spending money to deploy LIDB irrespective of this proceeding

The MFJ Court never ordered BPP or massive expenditures on LIDB. The Court did not even suggest that the BOCs do anything that they were not already doing in other contexts. The Court only said that it "expects that the Regional Companies will continue expeditiously to perfect the LIDB system." 698 F. Supp. at 367. As the Commission knows, the BOCs have been developing LIDB for a number of years to serve several functions. BPP is merely one possible function that could be provided through LIDB.

Furthermore, the MFJ Court never mandated BPP. The MFJ

²⁵ United States v. AT&T, § II (D)(1), 552 F. Supp. at 227.

Court's Order was issued to eliminate discriminatory routing of BOC public telephone traffic. When the Order was issued, the BOCs were routing all O+ calls from public payphones to AT&T. The issue that the Court resolved was which competitive system was to replace this discriminatory routing.

Although the Court did emphasize that a system that would permit the billed party to select the OSP by dialing O+ was desirable, the Court concluded that such a system was years from realization. The Court evaluated a number of other alternative O+ systems and finally concluded that premises-owner presubscription was the best option available. Thus, the Order mandated implementation of premises-owner presubscription, not BPP. The BOCs have every reason to continue with the development and implementation of LIDB for the same reasons that they started such development.

- b. Should the MFJ Court order the BOCs to use BPP, it will be as an antitrust remedy

If the MFJ Court ultimately orders the BOCs to implement BPP, it will be as a further remedy for past antitrust violations. The BOCs should not benefit from this remedy imposed as a sanction. The proposed rulemaking with tragic irony will harm an emerging competitive industry sector to protect former monopolists, and would be utterly inconsistent with the Commission's promotion of competition.

5. Market Forces, Not Government Agency Intervention,
Should Be Allowed to Influence O+ Services

The Commission's policy of encouraging competition in telecommunications markets is premised on the belief that a competitive marketplace will benefit consumers.²⁶ Rather than allowing the market to work, the Commission is now suggesting in the NPRM that it will step in with regulation to remedy a problem that does not exist, and may never exist, i.e., the alleged displacement of public telephones by private payphones at some time in the future. Such an action would run counter to the Commission's attempts to develop competitive markets for telecommunications services. The market can work to satisfy consumer needs and the Commission should allow it to do so in this instance.

As an example of these market forces at work, while the BOCs were ignoring the mandate of the MFJ that they provide equal access for all telephones, the operation of the market led IPPs to essentially the same result that the MFJ Court ultimately concluded was the best solution for public telephones. IPP telephones are routinely presubscribed to an OSP by the telephone owner, just as public telephones are now required to be presubscribed by the premises owner. The difference is that the operation of a competitive marketplace led to this result sooner than judicial or regulatory intervention.

²⁶ See generally, Computer III and Competitive Carrier Decisions.

This instance is no exception. Regulatory intervention aimed at issues better addressed by competitive market forces cannot seriously be expected to achieve beneficial results. The Commission should not abandon its policy of relying on competitive markets to serve the interests of consumers.

D. IF BPP IS ADOPTED BY THE COMMISSION, THERE IS NO LEGITIMATE BASIS FOR REQUIRING BPP FROM ALL PAY TELEPHONES

1. There Is Ample Precedent To Support Different Treatment of IPP Payphones and Public Telephones

Private payphones are just what their name implies -- the private property of their owners -- and the owners of such phones should be permitted to use them in whatever manner they choose, so long as there is no harm to the public network. Both the Commission and the courts long ago recognized the legitimate interest of the owners of telephone equipment in deciding how best to use that equipment.²⁷

In Hush-a-Phone Corp. v. United States, 238 F.2d 266 (D.C. Cir. 1956), the D.C. Circuit held that AT&T could not prohibit its customers from attaching to AT&T-owned telephone equipment devices designed to screen out background noise and protect privacy of conversations. The court held that AT&T's prohibition of such foreign attachments was an "unwarranted interference with the telephone subscriber's right reasonably to use his [or her]

²⁷ The two cases discussed below and all that followed from those cases are in addition to the distinction recognized by the MFJ Court as described earlier.

telephone in ways which are privately beneficial without being publicly detrimental."²⁸ This principle is even more significant here, where the telephone equipment at issue is owned by private individuals.²⁹

The Commission applied the same principle in Use of the Carterfone Device in Message Toll Tel. Serv., 13 F.C.C.2d 420 (1960). In that case, the Commission ruled that AT&T could not prohibit an interconnection between the public toll telephone system and private mobile radio systems. The Commission held that it was unreasonable to prohibit the use of interconnecting devices that do not adversely affect the telephone system. 13 F.C.C.2d at 423.

In Carterfone and Hush-a-Phone, the Commission and the court recognized the right of the equipment owner to determine the proper use of his or her equipment, so long as that use does not create public harm. Similarly, the private payphone owner should be permitted to determine how to make the best use of his or her telephones, and, in doing so, presubscribe them to an OSP to utilize the services of that carrier if he or she so chooses. In other words, without actual demonstrated public harm, the

²⁸ 238 F.2d at 269.

²⁹ In fact, given the motives of Bell Atlantic's petition, i.e. to preserve its public payphone domain, the well-spring of this proceeding is the private benefit of Bell Atlantic and other BOCs to the detriment of the public as described herein.

Commission should not interfere with the use of private payphones by their owners.

2. Presubscription Commissions Are Paid to Reimburse Premises Owners For Services, Not As a Bribe

The Commission appears to view presubscription commissions as some form of insidious payment made at the expense of consumers.³⁰ To the contrary, these commissions are a well-intentioned payment to the premises owner for his or her vigilance and responsibility regarding the payphone.³¹ The private payphone owner has a substantial nexus with the payphone on his or her premises and should be reimbursed for servicing that payphone. Without a commission, these premises owners would have little or no incentive to install and maintain payphones.

E. THE BOCS WILL NOT BE UNFAIRLY DISADVANTAGED IF BPP IS SHELVED, AND THE FCC SHOULD NOT GRANT THE BOCS' REQUEST FOR PROTECTION AGAINST COMPETITION

1. Bell Atlantic Is Not Motivated By Equal Access Concerns, But By Fear That The Application Of BPP To Public Payphones Will Cause Premises Owners To Switch To Private Payphones, And Thereby Reduce Its Revenues

The real concern of Bell Atlantic and, by extension, LECs, with regard to BPP is nothing more than the fact that they may

³⁰ The Commission states that BPP "would focus competition in operator services towards end users" and presumptively away from presubscription contract commissions for aggregators. NPRM at 9.

³¹ As an example, it is not the payphone caller that contacts the appropriate service provider when the payphone is broken. Rather, it is the premises owner or aggregator

lose some business as the result of enforcement of an antitrust decree that was intended to make the telecommunications industry more competitive. The BOCs assert, and the Commission appears to agree, that if BPP is implemented only for public telephones, then public telephones will be replaced by private telephones, since the owners of private payphones will continue to receive commissions from the OSPs to whom they presubscribe their telephones.

The assertion that the BOCs will lose business is purely speculative.³² Private payphones represent only 10% or less of the market³³ despite the fact that OSPs have always offered commissions on interLATA private payphone traffic. Thus, in the past, the availability of commissions did not cause a widespread defection of LEC customers. This imagined harm is certainly not sufficient to justify the rulemaking that the Commission is embarking upon.

2. The Commission Should Not Interpose Itself To Protect The Market Share Of Former Monopolists

As an equitable matter, the Commission is under no obligation to, and indeed should not, undertake a rulemaking to

³² The Commission has clearly enunciated the principle that relief will not be granted on the basis of surmise, speculation or conjecture. See e.g., In re Applications of Compass Rose Communications Corp., MM Docket No. 88-581, 6 F.C.C. Rcd 1518 (1991); In re Applications of Radio Jonesboro, Inc., BC Docket Nos. 82-641, 82-643, 82-645, 96 F.C.C.2d 1106 (rel. March 21, 1984).

³³ See Communications Daily, vol. 9, No. 63, April 3, 1989, at 3.

protect the business of the companies that already hold 90% of the pay telephone market. Since the consent decree that is apparently the impetus for this proposed rulemaking arose under the antitrust laws in the first instance, the policies and objectives of the antitrust laws are relevant in assessing the effects of that decree. The antitrust laws are intended to protect competition, not competitors.³⁴ Whether the LECs lose some business is irrelevant. The loss of market share is a normal and appropriate result of effective antitrust oversight and market competition.

The BOCs and the Commission's tentative approval of BPP will not work to promote competition, but will protect the OSPs against competition. The purpose of the MFJ was to eliminate monopoly and introduce competition into markets for communications services to the greatest extent possible. This objective will never be achieved if former monopolists are able to seek regulatory intervention to protect their already significant market share and, in the process, ironically but effectively, destroy competition and all of its attendant benefits.

³⁴ See Brunswick Corp. v. Pueblo Bowl-O-Mat, Inc., 429 U.S. 477, 488 (1977); Brown Shoe Co. v. United States, 370 U.S. 294, 320 (1962).

F. THIS PROPOSED RULEMAKING VIOLATES THE PRESIDENTIAL ORDER ON REGULATORY REFORMS

The Commission's proposed rulemaking violates the Presidential Order mandating reduced government regulation.³⁵ The Commission's BPP proposal would, as discussed above, lead inexorably to the devastation of the OSP and IPP industries. Costs of BPP implementation would be carried by consumers. Thus, the BPP rulemaking falls within the type of "prescriptive command-and-control requirements" that the Presidential Order was designed to stop.

The President, on January 28, 1992, ordered a moratorium on new regulatory initiatives not subject to statutory or judicial deadlines.³⁶ The President's purpose in executing this moratorium was to "weed out unnecessary and burdensome government regulation, which impose needless costs on consumers and substantially impede economic growth."³⁷ The measure was also designed "to ensure that, to the maximum extent possible, agency

³⁵ See Memorandum on Reducing the Burden of Government Regulation, 28 Weekly Comp. Pres. Doc. 232 (Jan. 28, 1992); Memorandum on Implementing Regulatory Reforms, 28 Weekly Comp. Pres. Doc. 728 (Apr. 29, 1992).

³⁶ Memorandum on Reducing the Burden of Government Regulation, 28 Weekly Comp. Pres. Doc. 232 (Jan. 28, 1992).

³⁷ Id. The moratorium was extended by 120 days by Executive Order on April 29, 1992. See Memorandum on Implementing Regulatory Reforms, 28 Weekly Comp. Pres. Doc. 728 (Apr. 29, 1992).

resources are devoted to reducing the regulatory burden on the economy."³⁸

The BPP rulemaking represents burdensome government regulations at their worst. As discussed above, needless costs will be imposed on O+ callers under BPP as consumers will have to foot the bill for this regulatory transformation. Moreover, BPP will impede competition for O+ services, especially for OSPs and IPPs. This rulemaking is anti-competitive and will result in monopolization for certain LECs of the operator services market. Instead of trying to implement regulatory reforms with market mechanisms as the President has ordered,³⁹ the Commission is seeking to impose by regulatory fiat burdensome and unwieldy regulations that will only hurt consumers, OSPs, IPPs and the economy.

III. CONCLUSION

The BPP routing system for O+ interLATA payphone calls, while of superficial appeal to the Commission, will result in nothing more than confusion and great expense for consumers. The Commission rests its case for BPP on several faulty assumptions. The Commission believes that the present system of O+ calling is puzzling to callers, and that BPP will resolve caller questions. As shown above, BPP will yield inconsistencies that will

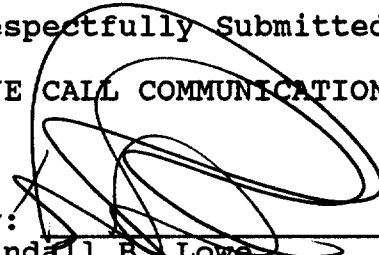
³⁸ Id.

³⁹ See Memorandum on Reducing Government Regulation at 233.

completely befuddle callers. Although not perfect, the present 0+ system is much easier to understand and use.

The Commission also argues that moving competition away from aggregators and focusing competition on end users will provide better services and lower prices to end users. As we have seen, implementing BPP will cost at least several hundred million dollars, and perhaps much more. These costs will be paid by the consumer. Moreover, competition in the operator services industry and among IPPs has kept costs low for callers. BPP will devastate OSPs and IPPs and support a LEC monopoly for these services. This monopoly will degrade services to consumers and lead to higher prices. Without appreciable benefits for the consumer, BPP is not worth its enormous costs and is clearly not in the public interest.

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CERTIFICATE OF SERVICE

I, Barbara L. Enloe, hereby certify that copies of the foregoing Comments of One Call Communications Inc. to the Proposed Rulemaking were served by first class mail, postage prepaid, this 7th day of July, 1992, to the persons listed on the attached Service List.


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July 7, 1992

ATTACHMENT

The following individuals and companies have authorized the use of their name in conjunction with OPTICOM's filing on Billed Party Preference. Please incorporate into OPTICOM's comments the following:

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